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*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF TORT
CLAIMANTS EXTENDING TIME TO
RESPOND TO MOTIONS TO BE HEARD
ON MARCH 12 AND 13, 2019**

[No Hearing Requested]

1 This stipulation and agreement for order (“Stipulation and Agreement for Order”) is
2 entered into by and between PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric
3 Company (the “Utility”), as debtors and debtors in possession (collectively, the “Debtors”), on
4 the one hand, and the Official Committee of Tort Claimants (the “Tort Committee”) on the other.
5 The Debtors and the Tort Committee are referred to in this Stipulation and Agreement for Order
6 collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as
7 follows:

8 **RECITALS**

9 A. On February 6, 2019, the Debtors filed a notice of hearing (the “Notice”)
10 [Dkt. 353] noticing sixteen (16) motions listed therein for a hearing before the Court at 9:30 a.m.
11 on February 27, 2019. At the February 27 hearing, four (4) motions, identified in the Notice as
12 the Cash Management Motion [Dkt. 7], the Customer Programs Motion [Dkt. 16], the
13 Operational Integrity Suppliers Motion [Dkt. 12], and the DIP Financing Motion [Dkt. 23] (the
14 “Motions”), were adjourned to hearings set for March 12, 2019 (as to the Customer Programs
15 Motion) and March 13, 2019 (as to the other three Motions).

16 B. Pursuant to the *Amended Notice of Agenda for February 27, 2019 9:30 a.m.*
17 *Omnibus Hearing*, filed by the Debtors on February 26, 2019 [Dkt. 668], the Tort Committee
18 and the Debtors agreed, and at the February 27, 2019 hearing, the Court authorized, that the time
19 for the Tort Committee to respond to the Motions be extended to 4:00 p.m. (Pacific Time) on
20 March 5, 2019.

21 C. Proposed counsel for the Tort Committee has requested, and proposed counsel for
22 the Debtors has agreed, that the time for the Tort Committee to respond to the Motions be further
23 extended.

24 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
25 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
26 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
27 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
28 **THAT:**

1 1. The time for the Tort Committee to file and serve any response or opposition
2 to the Motions be extended through 4:00 p.m. (Pacific Time) on March 8, 2019.
3
4

5 Dated: March 4, 2019

Dated: March 4, 2019

6 KELLER & BENVENUTTI LLP

BAKER & HOSTETLER LLP

7
8 /s/ Jane Kim

Jane Kim

/s/ Cecily A. Dumas

Cecily A. Dumas

9 *Proposed Attorneys for Debtors*
10 *and Debtors in Possession*

Proposed Attorneys for Official Committee
of Tort Claimants